



— CASTELLÓN & FUNDERBURK LLP —

A LIMITED LIABILITY PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

October 8, 2010

VIA HAND DELIVERY

Craig Whitenak, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Avenue, Suite 1420
Los Angeles, CA 90017

Re: Request for Information related to Yosemite Creek Superfund Site
San Francisco, California

Dear Mr. Whitenak:

This letter responds to the United States Environmental Protection Agency's ("EPA") correspondence and request for further information dated August 24, 2010, addressed to Pacific Gas and Electric Company ("PG&E") with regard to the Yosemite Creek Superfund site (the "Site"). The EPA's letter was a follow up to their October 15, 2009 request for information and PG&E's January 8, 2010 response to that letter.

Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and PG&E's previously asserted objections, PG&E submits the following in response to the EPA's request for further information.

RESPONSES TO THE INFORMATION REQUEST QUESTIONS

1. Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows:

PG&E's business can generally be described as follows: Pacific Gas and Electric Company, incorporated in California in 1905, is one of the largest combination natural gas and electric utilities in the United States. There are approximately 20,000 employees who carry out Pacific Gas and Electric Company's primary business—the transmission and delivery of energy. PG&E has facilities to generate, transmit and deliver electricity, and to transport, store and deliver natural gas. The company provides natural gas and electric service to approximately 15 million people throughout a 70,000-square-mile service area in northern and central California.

2. Provide the name (or other identifier) and address of any facilities where respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:

- a. ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.
- b. are/were located in California (excluding locations where ONLY clerical/office work was performed);
- c. are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows:

- a. PG&E is in possession of a copy of an inventory ledger from Waymire Drum Co., Inc., which indicates that PG&E may have transferred two containers to Waymire Drum Co., Inc. in 1978. After a reasonable search and diligent inquiry, PG&E was not able to authenticate the ledger or discover any further information about those containers other than what is stated herein. PG&E is not aware of any information regarding the contents of those containers, if any, where they originated, or their alleged delivery to Waymire Drum Co. PG&E's document retention policy requires that PG&E maintain documents for at least 7 years. As such, after a reasonable search and diligent inquiry, PG&E is not aware of any other documents, other than the document identified above, that show shipment of any containers to the BAD site.
- b. After a reasonable and diligent search, PG&E has documents listing and/or describing its facilities operating with a Hazardous Materials Business Plan (HMBP) in California. These documents

are Bates numbered PG&E000100-000736 and are being made available. PG&E's document retention policy requires that PG&E maintain documents for 7 years. As such, the potential information that is available is limited. After a reasonable search and diligent inquiry, PG&E is not in possession of documents regarding other PG&E facilities operating with a HMBP in California.

- c. After a reasonable search and diligent inquiry, PG&E is not aware of any information that would indicate that any PG&E facilities outside California sent any containers to California for recycling, cleaning, reuse, disposal, or sale. PG&E does not have operating facilities outside of California.

- 3. Provide a brief description of the nature of Respondent's operations at each Facility identified in your response to Question 2 (the "Facilities") including:
 - a. The date such operations commenced and concluded; and
 - b. The types of work performed at each location over time, including but not limited to the industrial, chemical or institutional processes undertaken at each location.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows:

- a. PG&E is in possession of documents listing and/or describing its facilities operating with a Hazardous Materials Business Plan (HMBP) in California. These documents are Bates numbered PG&E000100-000736 and will be made available. PG&E's document retention policy requires that PG&E maintain documents for 7 years. After a reasonable search and diligent inquiry, PG&E is not in possession of documents regarding any other facilities operating with a HMBP in California.
- b. After a reasonable and diligent search, PG&E has documents listing and/or describing its facilities operating with a Hazardous Materials Business Plan (HMBP) in California. These documents are Bates numbered PG&E000100-000736 and are being made available. PG&E's document retention policy requires that PG&E maintain documents for at least 7 years. As such, the potential information that is available is limited. After a reasonable search and diligent inquiry, PG&E is not in possession of documents regarding other facilities operating with a HMBP in California.

4. For each Facility, describe the types of records regarding the storage, production, purchasing, and use of Substances of Interest ("SOI") during the Relevant Time Period that still exist and the periods of time covered by each type of record.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified and located documents listing and/or describing its facilities operating with a Hazardous Materials Business Plan (HMBP) in California.. These documents are Bates numbered PG&E000100-000736 and will be made available. PG&E's document retention policy requires that PG&E maintain documents for 7 years. As such, the potential information that is available is limited. After a reasonable search and diligent inquiry, PG&E is not aware of any other facilities operating with a HMBP in California.

5. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use or store one of the COCs (including any substances or wastes containing the COCs) at any of the Facilities? State the factual basis for your response.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

6. If the answer to Question 5 is yes, identify each COC produced, purchased, used, or stored at each Facility.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

7. If the answer to Question 5 is yes, identify the time period during which each COC was produced, purchased, used or stored at each Facility.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames (1990-2010). A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

8. If the answer to Question 5 is yes, identify the average annual quantity of each COC produced, purchased, used, or stored at each Facility.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

9. If the answer to Question 5 is yes, identify the volume of each COC disposed by the Facility annually and describe the method and location of disposal.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

10. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store hydraulic oil or transformer oil at any of the Facilities? State the factual basis for your response to this question.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

11. If the answer to Question 10 is yes, identify each specific type of hydraulic oil and transformer oil produced, purchased, used, or stored at each Facility.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

12. If the answer to Question 10 is yes, identify the time period during which each type of hydraulic oil and transformer oil was produced, purchased, used, or stored.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

13. If the answer to Question 10 is yes, identify the average annual quantity of each type hydraulic oil and transformer oil purchased, produced, used, or stored at each Facility.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated spreadsheets which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

14. If the answer to Question 10 is yes, identify the volume of each hydraulic oil and transformer oil disposed by the Facility annually and described the method and location of disposal.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: After a reasonable and diligent search, PG&E has identified, located and generated list (spreadsheets) which show the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California. These documents indicate that at least one or more COC's, as defined by Information Request Definition No. 2, are present at one or more facility during the relevant time frames. A complete list that can be generated is being produced, and these documents are BATES numbered PG&E000737-000853 and are being made available. Given PG&E's document retention policy, limited back up documents are available.

15. Provide the following information for each SOI (SOIs include any substance or waste containing the SOI) identified in your responses to Questions 5 and 10:

- a. Describe briefly the purpose for which each SOI was used at the Facility. If there was more than one use, describe each use and the time period for each use;
- b. Identify the supplier(s) of the SOIs and the time period during which they supplied the SOIs, and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the procurement of the SOI;
- c. State whether the SOIs were delivered to the Facility in bulk or in closed containers, and describe any changes in the method of delivery over time;

- d. Describe how, where, when and by whom the containers used to store the SOIs (or in which the SOIs were purchased) were cleaned, removed from the Facility, and/or disposed of, and describe any changes in cleaning, removal, or disposal practices over time.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows:

a.- d. After a reasonable and diligent search, PG&E has identified, located, and/or generated documents showing the hazardous waste shipment records for Daly City facilities between 1990-2010 and San Francisco facilities between 2003-2010; documents showing the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California; and documents listing and/or describing its facilities operating with a Hazardous Materials Business Plan (HMBP) in California. These documents are BATES numbered PG&E000854-001044, PG&E000737-000853, and PG&E000100-000736 respectively and will be made available. PG&E's document retention policy requires that PG&E maintain documents for 7 years. As such, supporting documentation and information relating to the enclosed documents is limited. After a reasonable search and diligent inquiry, PG&E is not aware any other documents relating to the purpose or use of the materials referenced therein.

16. For each SOI delivered to the Facilities in closed containers, describe the containers, including but not limited to:

- a. The type of container (e.g. 55 gal. drum, tote, etc.);
- b. Whether the containers were new or used; and
- c. If the containers were used, a description of the prior use of the container.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows:

a.- c. After a reasonable and diligent search, PG&E has identified, located, and/or generated documents showing the hazardous waste shipment records for Daly City facilities between 1990-2010 and San Francisco facilities between 2003-2010; documents showing the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California; and documents

listing and/or describing its facilities operating with a Hazardous Materials Business Plan (HMBP) in California. These documents are BATES numbered PG&E000854-001044, PG&E000737-000853, and PG&E000100-000736 respectively and will be made available. PG&E's document retention policy requires that PG&E maintain documents for 7 years. As such, supporting documentation and information relating to the enclosed documents is limited. After a reasonable search and diligent inquiry, PG&E is not aware any other documents relating to the purpose or use of the materials referenced therein.

17. For each container that Respondent used to store a SOI or in which SOIs were purchased ("Substance-Holding Containers" or "SHCs") that was later removed from the Facility, provide a complete description of where the SHCs were sent and the circumstances under which the SHCs were removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response: After a reasonable and diligent search, PG&E has identified, located and/or generated documents showing the hazardous waste shipment records for the Daly City facilities between 1990–2010 and San Francisco facilities between 2003–2010, bates numbered PG&E00854-001044. PG&E's document retention policy requires that PG&E maintain records for 7 years. As such, supporting documentation and information is limited.

18. For each SHC that was removed from the Facility, describe Respondent's contracts, agreements, or other arrangements under which SHCs were removed from the Facility, and identify all parties to each contract, agreement, or other arrangement described. Distinguish between the Relevant Time period and the time period since 1988.

Response: After a reasonable and diligent search, PG&E has identified, located and/or generated documents showing the hazardous waste shipment records for the Daly City facilities between 1990–2010 and San Francisco facilities between 2003–2010, bates numbered PG&E00854-001044. PG&E's document retention policy requires that PG&E maintain records for 7 years. As such, supporting documentation and information is limited.

19. For each SHC, provide a complete explanation regarding the ownership of the SHC prior to delivery, while onsite, and after it was removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response: After a reasonable and diligent search, PG&E has identified, located and/or generated documents showing the hazardous waste shipment records for the Daly City facilities between 1990–2010 and San Francisco facilities between 2003–2010, bates numbered PG&E00854-001044. PG&E's document retention policy requires

that PG&E maintain records for 7 years. As such, supporting documentation and information is limited.

20. Identify all individuals who currently have, and those who have had, responsibility for procurement of Materials at the Facilities. Also provide each individual's job title, duties, dates performing those duties, current position or the date of the individual's resignation, and the nature of the information possessed by each individual concerning Respondent's procurement of Materials.

Response: The current Senior Director of Supply Chain is the individual who is the best position to address procurement issues. That individual is currently Gun Shim who may be contacted through counsel for PG&E, if necessary

21. Describe how each type of waste containing any SOIs was collected and stored at the Facilities prior to disposal/recycling/sale/transport, including:

- a. The type of container in which each type of waste was placed/stored;
- b. How frequently each type of waste was removed from the Facility;

Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows:

- a. After a reasonable and diligent search, PG&E has identified, located and/or generated documents showing the hazardous waste shipment records for the Daly City facilities between 1990–2010 and San Francisco facilities between 2003-2010, bate numbered PG&E00854-001044. PG&E's document retention policy requires that PG&E maintain records for 7 years. As such, supporting documentation and information is limited.

22. Describe the containers used to remove each type of waste containing any SOIs from the Facilities, including but not limited to:

- a. The type of container (e.g. 55 gal. drum, dumpster, etc.);
- b. The colors of the containers;
- c. Any distinctive stripes of other markings on those containers;
- d. Any labels or writing on those containers (including the content of those labels);
- e. Whether those containers were new or used; and
- f. If those containers were used, a description of the prior use of the container;

Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows:

- a.-f. After a reasonable and diligent search, PG&E has identified, located and/or generated documents showing the hazardous waste shipment records for the Daly City facilities between 1990–2010 and San Francisco facilities between 2003–2010, bate numbered PG&E00854-001044. PG&E's document retention policy requires that PG&E maintain records for 7 years. As such, supporting documentation and information is limited.

23. For each type of waste generated at the Facilities that contained any of the SOIs, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling and identify all parties to each contract, agreement, or other arrangement described. State the ownership of waste containers as specified under each contract, agreement, or other arrangement described and the ultimate destination or use for such containers. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response: After a reasonable and diligent search, PG&E has identified, located and/or generated documents showing the hazardous waste shipment records for the Daly City facilities between 1990–2010 and San Francisco facilities between 2003–2010, bate numbered PG&E00854-001044. PG&E's document retention policy requires that PG&E maintain records for 7 years. As such, supporting documentation and information is limited.

24. Identify all individuals who currently have, and those who have had, responsibility for Respondent's environmental matters (including responsibility for the disposal, treatment storage, recycling, or sale of Respondent's wastes and SHCs). Provide the job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response: The Director of Environmental Operations is the individual who is in the best position to address environmental matters. That individual is currently Diane Thurman who may be contacted through counsel for PG&E, if necessary.

25. Did Respondent ever purchase drums or other containers from a drum recycler or drum reconditioner? If yes, identify the entities or individuals from which Respondent acquired such drums or containers.

Response: PG&E does not purchase drums that are recycled or reconditioned. In addition, PG&E has not located or identified any individuals who are aware that PG&E purchased recycled or reconditioned drums.

26. Prior to 1988, did Respondent always keep its waste streams that contained SOIs separate from its other waste streams?

Response: PG&E currently separates all waste streams consistent with all federal state and local hazardous materials and waste laws, and complies with all federal, state and local requirements for accumulating, transporting and disposal of hazardous materials and wastes. In addition, prior to 1988 PG&E practices would have been to comply with all federal and state and local hazardous materials and waste laws and requirements and no documents have been identified that indicate that waste hazardous streams were mixed.

27. Identify all removal and remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C § 9601 et seq., or comparable state law; all corrective actions conducted pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.; and all cleanups conducted pursuant to the Toxic Substances Control Act, 15 U.S.C. § 2601 et seq. where (a) one of the COCs was addressed by the cleanup and (b) at which Respondent paid a portion of the cleanup costs or performed work. Provide copies of all correspondence between Respondent and any federal or state government agency that (a) identifies a COC and (b) is related to one of the above-mentioned sites.

Response: PG&E as owner, operator, occupier or landlord of a very large geographic territory has conducted or been involved in numerous cleanup activities performed consistent with federal, state and local laws since the passage of CERCLA, RCRA and TSCA. Given the nature of PG&E's business, the number of cleanup activities exceeds several thousand. As such, if EPA requires further information, PG&E will need a more specific location or general area so that it may more specifically address this request and will then endeavor to provide more information and/or documents to the extent they are available.

28. Provide all records of communication between Respondent and Bay Area Drum Company, Inc.; Meyers Drum Company; A.W. Sorich Bucket and Drum Company; Waymire Drum Company, Inc.; Waymire Drum and Barrel Company, Inc.; Bedini Barrels Inc.; Bedini Steel Drum Corp.; Bedini Drum; or any other person or entity that owned or operated the facility located at 1212 Thomas Avenue, in the City and County of San Francisco, California.

Response: PG&E is in possession of a copy of an inventory ledger from Waymire Drum Co., Inc., which indicates that PG&E may have transferred two containers to Waymire Drum Co., Inc. in 1978. This ledger will be made available. After a reasonable search and diligent inquiry, PG&E was not able to authenticate the

ledger or discover any further information or documents about those containers other than what is stated herein.

29. Identify the time periods regarding which Respondent does not have any records regarding the SOIs that were produced, purchased, used or stored at the Facilities.


Response: PG&E document retention policy is to maintain documents for 7 years. As such PG&E has limited documents and information.

30. Provide copies of all documents containing information responsive to the previous twenty-nine questions and identify the questions to which each document is responsive.

Response: Subject to the objections raised in PG&E's initial response to the EPA's request for information dated January 8, 2010 and subject to our understanding of the EPA's questions and without waiving any objections or privileges, PG&E responds as follows: PG&E is in possession of a copy of an inventory ledger from Waymire Drum Co., Inc., which indicates that PG&E may have transferred two containers to Waymire Drum Co., Inc. in 1978. This ledger will be made available. After a reasonable search and diligent inquiry, PG&E was not able to authenticate the ledger or discover any further information or documents about those containers other than what is stated herein. PG&E is in possession of documents showing the hazardous waste shipment records for Daly City facilities between 1990-2010 and San Francisco facilities between 2003-2010; documents showing the hazardous material inventory for its substations and service centers located in the areas in and around San Francisco, California; and documents listing and/or describing its facilities operating with a Hazardous Materials Business Plan (HMBP) in California between the years 1940-1988. These documents are BATES numbered PG&E000854-001044, PG&E000737-000853, and PG&E000100-000736 respectively and are being made available. PG&E's document retention policy requires that PG&E maintain documents for at least 7 years. After a reasonable search and diligent inquiry, PG&E is not aware any other information regarding the storage and containment of the materials referenced therein. Other than with respect to documents generated in the past 7 years.

Thank you for your time and attention. If you have any further questions about this matter, please feel free to contact our office.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ruben Castellón', with a stylized flourish at the end.

Ruben Castellón

Enclosures